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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROSS UNIVERSITY SCHOOL OF
MEDICINE and GLOBAL EDUCATION
INTERNATIONAL, INC.,

Plaintiffs,

v.

BEHZAD AMINI, WWW.ROSSU.NET,
WWW.ROSSMEDICALSCHOOL.ORG,
WWW.ROSSMEDSCHOOL.COM and
WWW.JOHNDOEROSSINFRINGINGSITES1
-20.DOE

Defendants.

Civil Action No. 13-6121(AET)

**ORDER TO SHOW CAUSE
WITH TEMPORARY RESTRAINTS**

This matter comes before the Court upon the application of plaintiffs Ross University School of Medicine ("RUSM") and Global Education International, Inc. (collectively "Plaintiffs") seeking a temporary restraining order and order to show cause why a preliminary injunction should not issue against defendants for the relief sought in the Verified Complaint. Based on the Verified Complaint and the exhibits attached thereto, Plaintiffs' memorandum of law, and the arguments of counsel:

IT IS on this 16th day of October, 2013,

THAT THIS COURT DETERMINES:

1. Notice of this application and copies of the supporting papers were provided to defendant Amini electronically via the same means plaintiffs' counsel had used to deliver him a cease and desist letter to which he replied, but did not cease and desist as demanded by plaintiffs.

2. Plaintiffs are likely to succeed on the merits of their causes of action against Defendants Behzad Amini, www.RossU.net, www.RossMedicalSchool.org, www.RossMedSchool.com and www.JohnDoeRossInfringingSites1-20.doe ("Defendants").

3. Plaintiffs will be irreparably injured as a result of Defendants' continued maintenance and use of the websites named www.RossU.net, www.RossMedicalSchool.org, www.RossMedSchool.com and www.JohnDoeRossInfringingSites1-20.doe (the "Offending, Infringing Sites");

4. The public interest is served by restraining Defendants' use of the Offending, Infringing Sites;

5. Defendants will not be unduly harmed by the entry of injunctive relief; and

6. It is necessary to grant this Order on less that the requisite period of notice to Defendants because of the immediate and irreparable nature of the of injury Plaintiffs will likely suffer if the relief is not granted, and because Defendants will not be unduly injured as a result of entry of this Order.

AND, THEREFORE, IT IS HEREBY ORDERED THAT:

1. Defendants, and all those acting in concert with Defendants, are hereby required to immediately identify to Plaintiffs' counsel and the Court each and every URL registered to, by or for defendant Behzad Amini that contains the word "Ross".

2. Defendants, and all those acting in concert with Defendants, are hereby enjoined and restrained, pending the return date on the order to show cause, from:

- a. Directly or indirectly publishing or disseminating, whether through the Offending, Infringing Sites or other outlets or mediums, any statements that would disparage, reflect negatively upon or otherwise call into question RUSM's business operations, products, services, integrity, reputation or business relationships, or the business operations, products, services, integrity, reputation or business relationships of RUSM and/or any of its parent, subsidiary or any other affiliated entities, and any and all of its or their former and current members, principals, directors, officers, shareholders, employees, agents, attorneys, contractors, representatives, affiliates, predecessors, successors and assigns, including but not limited to any further disparaging communications with representatives of RUSM's affiliated institutions or governmental regulators or any of recipients of the emails identified in the Verified Complaint at paragraphs 65, 68, 78 and 82;
- b. Using the Offending, Infringing Sites in any manner; and
- c. Attempting to sell, selling or transferring any interest in the Offending, Infringing Sites.

3. Defendants, and all those through whom Defendants are acting, as well as all those acting in concert with Defendants, are hereby directed to

- a. Immediately turn over the Offending, Infringing Sites to Plaintiffs' counsel;
- b. Cancel the links on defendant Amini's webpage through the Offending, Infringing Sites URLs; and
- c. Return it to an inactive status pending the hearing on preliminary injunction.

4. Each and every applicable registrar with which any of the Offending, Infringing Sites are registered are hereby directed to immediately deem as forfeited or cancelled each domain name for the Offending, Infringing Sites and to transfer of the domain names for same to Plaintiffs, consistent with 15 U.S.C. § 1125(d)(1)(C)

5. Defendants shall appear and show cause why a preliminary injunction should not be entered pending a final determination of this action providing as follows:


- a. Enjoining Defendants from directly or indirectly publishing or disseminating, whether through the Offending, Infringing Sites or other outlets or mediums, any statements that would disparage, reflect negatively upon or otherwise call into question RUSM's business operations, products, services, integrity, reputation or business relationships, or the business operations, products, services, integrity, reputation or business relationships of RUSM and/or any of its parent, subsidiary or any other affiliated entities, and any and all of its or their former and current members, principals, directors, officers, shareholders, employees, agents, attorneys, contractors, representatives, affiliates, predecessors, successors and assigns;
- b. Enjoining Defendants and their agents from using the Offending, Infringing Sites;
- c. Enjoining Defendants and their agents from attempting to sell, selling or transferring any interest in the Offending, Infringing Sites;
- d. Requiring Defendants and those through whom Defendants are acting, and those acting in concert with Defendants to immediately turn over the Offending, Infringing Sites to Plaintiffs;
- e. Requiring Defendants and those through whom Defendants are acting, and those acting in concert with Defendants, to cancel the links on defendant Amini's webpages through the Offending, Infringing Sites URLs, and
- f. Requiring Defendants and those through whom Defendants are acting, and those acting in concert with Defendants, to return each Offending, Infringing Site to an inactive status pending the hearing on preliminary injunction;
- g. Directing each and every applicable registrar with which any of the Offending, Infringing Sites are registered to immediately deem as forfeited or cancelled each domain name for the Offending, Infringing Sites; and
- h. Directing each and every applicable registrar with which any of the Offending, Infringing Sites are registered to transfer the domain names for same to Plaintiffs, consistent with 15 U.S.C. § 1125(d)(1)(C)

6. Copies of this Order and all papers supporting Plaintiffs' application shall be served upon defendant Amini by electronic means, and sent to the address for notice specified in his agreement with RUSM dated February 10, 2012, no later than three days after the entry of this Order. Any opposing papers by Defendants shall be filed and served by personal service so as to be received by plaintiff's counsel no later than noon 5 days prior to the preliminary injunction hearing as set forth below. Any reply papers shall be filed and served by electronic means and sent to the address for notice specified in his agreement with plaintiff dated February 10, 2012 no later than noon 2 days prior to the preliminary injunction hearing set forth below.

7. The preliminary injunction hearing shall be heard at 10:30 a.m./p.m. on October 28th 2013, in Courtroom 4W of the above-entitled court.

8. Plaintiffs shall not be required to post a bond.

9. By the terms of this Order, Plaintiffs' counsel, or any agent designated by them, is authorized and appointed under Federal Rule of Civil Procedure 4 to serve this Order to Show Cause and Verified Complaint upon each defendant. Defendants each have twenty days to answer, move or otherwise respond to the Verified Complaint. Service by electronic means is deemed adequate and sufficient.


United States District Court Judge